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July 22, 2011

Honorable Nancy Joseph  
United States District Court  
Eastern District of Wisconsin  
517 E. Wisconsin Avenue  
Milwaukee, Wisconsin 53202

RE: *United States v. Roland Flath*  
Case No. 11-Cr-69

Dear Judge Joseph:

This Court ordered the parties to confer regarding stipulated facts and disputed facts with respect to Defendant Roland Flath's motion to suppress and motion to dismiss and Flath's request for an evidentiary hearing regarding these motions on or before July 22, 2011.

The parties met on July 19 to discuss these issues and made significant progress. The facts to which the parties have already stipulated will be filed later today.

With respect to certain facts regarding the procedures surrounding how the search warrant that is the subject of the motion to suppress was issued, however, the government advised defense counsel that it did not know the information the defense sought. That information is the evidence submitted to the warrant-issuing judge in support of the request for a search warrant, the standards used in Belize to determine whether a search warrant should be issued, and whether the official who issued the search warrant is a member of law enforcement or serves under an independent judiciary.

The government advised defense counsel that it must contact officials from Belize to determine this information. And to do that, the government must go through

diplomatic channels at the United States Department of State to receive permission to contact the Belizean officials.

The parties therefore ask the Court to extend the deadline to file a final list of the stipulated facts and material disputed facts regarding the pretrial motions to September 22, 2011.

Thank you for your attention to this matter.

Sincerely,

/s/     **Brian P. Mullins**  
Counsel for Roland Flath